

# EXHIBIT A

This is not the official court record. Official records of court proceedings may only be obtained directly from the court maintaining a particular record.

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**National Police Association, Inc. v. Peter Hoell, The Village of Germantown**

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Case Number	49D14-2009-PL-030208
Court	Marion Superior Court, Civil Division 14
Type	PL - Civil Plenary
Filed	09/01/2020
Status	09/01/2020 , Pending (active)

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**Parties to the Case**

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Defendant Hoell, Peter

Address

W157 N9790 Glenwod Rd  
Germantown, WI 53022

Attorney

Kyle A Jones  
#1427449, Retained

101 West Ohio Street  
Ninth Floor  
Indianapolis, IN 46204  
317-269-9330(W)

---

Defendant The Village of Germantown

Attorney

Kyle A Jones  
#1427449, Retained

101 West Ohio Street  
Ninth Floor  
Indianapolis, IN 46204  
317-269-9330(W)

---

Plaintiff National Police Association, Inc.

Attorney

Derek Robert Peterson  
#3107849, Retained

156 Stony Creek Overlook  
Noblesville, IN 46060  
781-492-3701(W)

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**Chronological Case Summary**

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09/01/2020 Case Opened as a New Filing

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**09/01/2020 Subpoena/Summons Filed**

Summons - Peter Hoell

Filed By: National Police Association, Inc.

File Stamp: 09/01/2020

**09/01/2020 Subpoena/Summons Filed**

Summons - Village of Germantown

Filed By: National Police Association, Inc.

File Stamp: 09/01/2020

**09/01/2020 Appearance Filed**

Appearance - National Police Association, Inc.

For Party: National Police Association, Inc.

File Stamp: 09/01/2020

**09/01/2020 Complaint/Equivalent Pleading Filed**

Complaint &amp; Demand for Jury Trial

Filed By: National Police Association, Inc.

File Stamp: 09/01/2020

**09/22/2020 Certificate of Issuance of Summons**

Certificate of Issuance of Summons &amp; Notice of Perfected Service

Filed By: National Police Association, Inc.

File Stamp: 09/22/2020

**09/25/2020 Appearance Filed**

Appearance of Jones for Defendants

For Party: Hoell, Peter

For Party: The Village of Germantown

File Stamp: 09/25/2020

**09/25/2020 Notice Filed**

Defendants' Notice of Automatic Enlargement of Time to Respond to Plaintiff's Complaint

Filed By: Hoell, Peter

Filed By: The Village of Germantown

File Stamp: 09/25/2020

**Financial Information**

\* Financial Balances reflected are current representations of transactions processed by the Clerk's Office. Please note that any balance due does not reflect interest that has accrued – if applicable – since the last payment. For questions/concerns regarding balances shown, please contact the Clerk's Office.

**National Police Association, Inc.**

Plaintiff

Balance Due (as of 10/02/2020)

0.00

**Charge Summary**

Description	Amount	Credit	Payment
Court Costs and Filing Fees	157.00	0.00	157.00

**Transaction Summary**

Date	Description	Amount
09/01/2020	Transaction Assessment	157.00
09/01/2020	Electronic Payment	(157.00)

This is not the official court record. Official records of court proceedings may only be obtained directly from the court maintaining a particular record.

The seal of Marion County Courts, Indiana, is a circular emblem. The outer ring contains the text "MARION COUNTY COURTS" at the top and "INDIANA" at the bottom. In the center of the seal, the word "SEAL" is prominently displayed.

SUMMONS PREPARED BY:



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Derek R. Peterson, Atty. No.: 31078-49

Derek R. Peterson – Attorney at Law

156 Stony Creek Overlook

Noblesville, Indiana 46060

T: 781.492.3701

E: [DRPetersonlaw@gmail.com](mailto:DRPetersonlaw@gmail.com)

*Counsel for Plaintiff*



The seal of Marion County Courts, Indiana, is a circular emblem. It features the words "MARION COUNTY COURTS" in a curved path along the top inner edge and "INDIANA" in a curved path along the bottom inner edge. In the center of the seal, the word "SEAL" is printed in a large, bold, sans-serif font.

SUMMONS PREPARED BY:

A handwritten signature in cursive script, appearing to read 'Derek Peterson', written in black ink.

---

Derek R. Peterson, Atty. No.: 31078-49

Derek R. Peterson – Attorney at Law

156 Stony Creek Overlook

Noblesville, Indiana 46060

T: 781.492.3701

E: [DRPetersonlaw@gmail.com](mailto:DRPetersonlaw@gmail.com)

*Counsel for Plaintiff*



1. The party on whose behalf this form is being filed is: Initiating **X**; and the undersigned attorney identified on this form hereby enters his appearance in this case on behalf of the above-identified **PLAINTIFF, NATIONAL POLICE ASSOCIATION, INC.**
2. Attorney information for service as required by Trial Rule 5(B)(2):  
  
Derek R. Peterson,  
Atty. No.: 31078-49  
Derek R. Peterson – Attorney at Law  
156 Stony Creek Overlook  
Noblesville, Indiana 46060  
T: 781.492.3701  
E: DRPetersonlaw@gmail.com
3. This is a **PL** case type as defined in administrative Rule 8(B)(3).
4. Attorney for Plaintiffs **WILL NOT** accept service by fax.
5. Attorney for Plaintiffs **WILL** accept service by Indiana Electronic Filing Service (IEFS) and Electronic Mail (E-mail).
6. This case **DOES NOT** involve child support issues.
7. This case **DOES NOT** involve a protection from abuse order, a workplace violence restraining order, or a no – contact order.
8. This case **DOES NOT** involve a petition for involuntary commitment.
9. There are **NO** related cases. However, this is matter is being pursued in part as judicial review of an administrative agency action taken against Petitioner.

10. Additional information specified by state or local rule required to maintain the information management system employed by the court: N/A

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Derek R. Peterson', written over a horizontal line.

Derek R. Peterson

Atty. No.: 31078-49

156 Stony Creek Overlook,

Noblesville, Indiana 46060

Tel: 781.492.3701

Email: [DRPetersonlaw@gmail.com](mailto:DRPetersonlaw@gmail.com)

Counsel for Plaintiff

Marion Superior Court, Civil Division 14

STATE OF INDIANA            )       IN THE MARION COUNTY SUPERIOR COURT  
                                  ) SS:  
COUNTY OF MARION        )       CAUSE NO.:

NATIONAL POLICE ASSOCIATION, INC.,  
Plaintiff,  
  
vs.  
  
THE VILLAGE OF GERMANTOWN, a foreign  
municipal corporation; and PETER HOELL,  
individually and in his capacity as agent of THE  
VILLAGE OF GERMANTOWN  
Defendants.

**COMPLAINT &**  
**DEMAND FOR JURY TRIAL**

COMES NOW, the National Police Association, Inc., herein (“Plaintiff”), by counsel, Derek R. Peterson, and respectfully submits Plaintiff’s “Complaint & Demand for Jury Trial” (“Complaint”), to this Court and against the Village of Germantown and Peter Hoell, jointly and severally, and hereby alleges the following facts and claims:

## THE PARTIES

1. Plaintiff is an Indiana non-profit 501(c)(3) educational organization headquartered at 8710 Bash Street #501692, Indianapolis, Indiana 46250, which is located within Marion County, Indiana.
2. Defendant, the Village of Germantown, herein (“Defendant Germantown”), is a foreign municipal corporation, with a principal address of N112 W17001 Mequon Road Germantown, Wisconsin 53022, which is located within Washington County, Wisconsin.
3. Washington County, Wisconsin is adjacent to Milwaukee County, Wisconsin.
4. Both Washington County and Milwaukee County are a part of the Milwaukee Metropolitan area.

5. Defendant, Peter Hoell, herein (“Defendant Hoell”), is a resident of Defendant Germantown, with a principal address of W157 N9790 Glenwood Rd, Germantown, WI, 53022-5139.

6. Between January 1, 2018 through December 20, 2019, Defendant Hoell served as Chief of Police for Defendant Germantown.

#### FACTS GIVING RISE TO COMPLAINT

7. At all times relevant, Plaintiff operated as a 501(c)(3) non-profit educational organization, whose mission was to educate supporters of law enforcement in how to help police departments across the country accomplish their goals of effective law enforcement, through clear communications designed to combat the influence of anti-police activists and promote policies which encourage public officials to work together with police in the public interest.

8. At all times relevant, Plaintiff was registered with the Wisconsin Secretary of State, authorizing Plaintiff to engage in business and activities related to Plaintiff’s 501(c)(3) status and mission statement.

9. In the first three (3) months of 2018, Plaintiff via U.S. Mail sent “The National Sanctuary Area Crime Impact Survey,” herein (“NPA Survey”), to various parts of the country that were relevant to the NPA Survey, including to residents located in Defendant Germantown.

10. In or about March 2019, Defendant Hoell participated in an interview with the Indy Star, wherein Defendant Hoell was quoted with having stated the following:

Hoell told residents to disregard the letter. He also reported the National Police Association to the U.S. Postal Inspection Service over what he considered to be fraudulent mail.

\*\*\*

It’s a scam,” Hoel (*sic*) said. “It’s no different than any other scam — just a different angle.”



11. On March 17, 2019, Defendant Hoell's statements regarding Plaintiff were published to the public.

12. On or about March 17, 2019, Plaintiff's learned of Defendant Hoell's and/or Defendant Germantown's prior defamatory statements published on the social media platform – Facebook, herein ("May 31, 2018 Facebook Post"). A true and accurate copy of the May 31, 2018 Facebook Post is attached hereto and incorporated herein as Exhibit 1.

13. Upon information and belief, the May 31, 2018 Facebook Post was published to the public on or about May 31, 2018, where it has remained through the date of filing this Complaint.

14. On or about October 23, 2019, Defendant Hoell and/or Defendant Germantown published another Facebook Post, herein ("October 23, 2019 Facebook Post"). A true and accurate copy of the October 23, 2019 Facebook Post is attached hereto and incorporated herein as Exhibit 2.

15. Upon information and belief, the October 23, 2019 Facebook Post was published to the public on or about October 23, 2019, where it has remained through the date of filing this Complaint.

16. At all times relevant, Defendant Germantown, through other elected officers, boards and/or commissions, was responsible for the oversight and supervision of Defendant Hoell.

17. Each of the defamatory statements and matters published or spoken by Defendant Hoell were in regard to Plaintiff.

18. As a result of the actions undertaken by Defendant Germantown and Defendant Hoell, Plaintiff has suffered harm, injuries and damages.

19. The statements made by Defendant Hoell were false and/or misleading. More specifically, thrice labeling Plaintiff as a “scam;” twice claiming to have reported Plaintiff to the U.S. Postal Inspector for fraud; claiming that the NPA Survey “states that Germantown is a Federally Designated Sanctuary City;” claiming that the NPA Survey contains and/or is “false information;” claiming to have received a “call from a Police Association, possibly the [Plaintiff] to my home;” further publishing a defamatory article concerning Plaintiff; claiming that the “[NPA Survey] falsely warned that Germantown is a sanctuary city, not cooperating with federal immigration enforcement; and instructing third-parties to “disregard the letter” on account of false information were all false statements, claims and otherwise defamatory statements made against Plaintiff.

CLAIMS  
Defamation Per Se

20. Paragraphs One (¶1) through Nineteen (¶19) are incorporated by reference herein and should be treated as if restated in their entirety.

21. Defendant Hoell’s statements as contained in this Complaint and Exhibits 1 – 2 constitute defamation *per se* in that the defamatory statements impute criminal conduct on the part of Plaintiff and/or impute misconduct by Plaintiff in Plaintiff’s trade, profession, office, or occupation.

22. Defendant Hoell’s statements were made with either negligence and/or actual malice.

23. Defendant Hoell’s statements were published to the public.

Defamation Per Quod

24. Paragraphs One (¶1) through Nineteen (¶19) are incorporated by reference herein and should be treated as if restated in their entirety.



25. Additionally, Paragraphs Twenty-One (§21) through Twenty-Three (§23) are incorporated by reference herein and should be treated as if restated in their entirety.

26. As a result of Defendant Hoell's conduct, Plaintiff has suffered damages from loss of donations and other business benefits, harm to the business reputation of Plaintiff and injuries to the character and business of Plaintiff.

42 U.S.C. § 1985

27. Paragraphs One (§1) through Nineteen (§19) are incorporated by reference herein and should be treated as if restated in their entirety.

28. Defendant Hoell in concert, connection and/or under the supervision and tacit approval of Defendant Germantown, engaged in a conspiracy with Defendant Germantown for the purpose of depriving, either directly or indirectly, Plaintiff of the equal protection of the laws and/or of the equal privileges and immunities under the laws. Specifically, constitutional protections to be free from harmful and/or defamatory speech, while Plaintiff engages in its own constitutionally protected and statutorily authorized activities.

29. Defendant Hoell and Defendant Germantown acted in furtherance of this conspiracy when Defendant Hoell published the defamatory statements, while Defendant Germantown remained silent and/or approved of the defamatory statements once becoming aware of such defamatory statements being made by Defendant Hoell.

30. Defendant Hoell and Defendant Germantown have caused injury to Plaintiff, Plaintiff's property, and/or a deprivation of Plaintiff's right or privilege to engage in its constitutionally and statutorily protected activities.

Demand for Jury Trial

31. Plaintiff, pursuant to Ind. R. Tr. P., Rule 38, demands that this matter be tried by jury.

WHEREFORE, Plaintiff, the National Police Association, Inc., respectfully prays of this Court to issue the following relief:

1. Liability of Defendant Hoell and/or Defendant Germantown, jointly and/or severally;
2. Damages in the form of compensatory, presumed, actual, punitive, exemplary, treble and/or special in an amount to be determined by a jury, which will appropriately and fairly compensate Plaintiff for the damages, injuries and harms suffered as a result of Defendant Hoell's and Defendant Germantown's conduct;
3. An award of interests, costs, fees, including reasonable attorney fees, incurred as a result of Defendant Hoell's and Defendant Germantown's conduct;
4. An order enjoining Defendant Hoell and Defendant Germantown from making further false, defamatory and/or disparaging statements, from conspiring to cause additional harm and/or damage and/or engaging in any acts of retaliation against Plaintiffs; and
5. For all other just and proper relief under the premises.

Respectfully Submitted,



Derek R. Peterson  
Atty. No.: 31078-49  
Derek R. Peterson – Attorney at Law  
156 Stony Creek Overlook  
Noblesville, Indiana 46060  
T: 781.492.3701  
E: DRPetersonlaw@gmail.com





Germantown Police Department Wisconsin

49B14-2009-PL-030208

May 31, 2018

Marion Superior Court, Civil Division 14

Filed: 9/1/2020 2:54 PM

Clerk

Marion County, Indiana

### Scam Alert,

Some residents in Germantown are receiving letters with surveys claiming to be from the "National Police Association." The material states that Germantown is a Federally Designated Sanctuary City. This is false information. They are also asking for donations to the National Police Association to go along with the returned survey. The material is claiming to be from Topeka, Kansas and the return envelope is going to a PO Box in Stuarts Draft, Virginia.



Facebook reaction icons: a thumbs up, a sad face, and a surprised face. 48

12 Comments 94 Shares

Share

Most Relevant ▼





**Germantown Police Department Association**

October 23, 2019 **Marion Superior Court, Civil Division 14**

Filed: 9/1/2020 2:54 PM  
Clerk  
Marion County, Indiana

A call from a Police Association, possibly the National to my home.

Yesterday, Tuesday, October 22, my wife took a call at our home from someone claiming to be with a Police Association, possibly National. The purpose of the call was to seek donations for "your local Police Department." They stated: "Give our law enforcement officers the crime prevention tools they need." My wife did not complete the call and hung up on them. What I can tell you is that the Germantown Police Department has never had a relationship with the National Police Association, nor have we received any financial support from them.

I have attached an article about this group from March of this year. Towards the end of the article I was quoted with the following: Fundraising letters in Germantown, Wi., falsely warned that Germantown is a sanctuary city, not cooperating with federal immigration enforcement. Germantown Police Chief Peter Hoell told residents to disregard the letter. He reported the association to the U.S. Postal Inspection Service over what he considered to be fraudulent mail. "It's a scam," Hoell said.

<https://thecrimereport.org/.../chiefs-call-national-police-a.../>

## Up For The Crime R



ee Weekly Newslett

THECRIMEREPORT.ORG

### Chiefs Call National Police Association a Scam | The Crime Report

The Indiana group raises money by warning of the "greatest threats to our public safety in the nation's history." The income does not go to police...

40

15 Comments 22 Shares



1

Mr. Peter Hoell  
W157 N9790 Glenwod Rd.  
Germantown, WI 53022-5139  
**Date Mailed:** September 2, 2020  
**Tracking No.:** 7018 2290 0001 1037 2571  
**Return Receipt:** September 4, 2020  
**See Exhibit 1**

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read 'Derek Peterson', written in dark ink.

Derek R. Peterson  
Atty. No.: 31078-49  
Derek R. Peterson – Attorney at Law  
156 Stony Creek Overlook  
Noblesville, Indiana 46060  
T: 781.492.3701  
E: DRPetersonlaw@gmail.com  
Attorney for Plaintiff,



## EXHIBIT

1

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

VILLAGE OF GERMAN TOWN  
C/O VILLAGE ADMINISTRATOR  
N172 WILCOX MEQUON RD  
GERMANTOWN, WI 53022



9590 9403 0566 5173 1149 03

## 2. Article Number (Transfer from service label)

2290 0001 1037

## COMPLETE THIS SECTION ON DELIVERY

## A. Signature

X

Honice Nick

- ☐ Agent  
☐ Addressee

## B. Received by (Printed Name)

JANICE NICK

## C. Date of Delivery

9-4-20

- D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

## 3. Service Type

- ☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☐ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Insured Mail  
☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☐ Return Receipt for Merchandise  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

Mrs. PETER HOELL  
W157 N9790 Glenwood RD  
GERMANTOWN, WI 53022-5139



9590 9403 0566 5173 1148 80

7018 2290 0001 1037 2571

## COMPLETE THIS SECTION ON DELIVERY

## A. Signature

X

Peter Hoell

- ☐ Agent  
☐ Addressee

## B. Received by (Printed Name)

PETER HOELL

## C. Date of Delivery

9-4-20

- D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

## 3. Service Type

- ☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☐ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Insured Mail  
☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☐ Return Receipt for Merchandise  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

PS Form 3811, April 2015 PSN 7530-02-000-9053

U.S. Postal Service™

Filed: 9/22/2020 12:23 PM

CERTIFIED MAIL® RECEIPT

Clerk

Domestic Mail Only

Marion County, Indiana

For delivery information, visit our website at www.usps.com®

Germantown, WI 53022

Certified Mail Fee

\$3.55

Extra Services &amp; Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$0.00  
☐ Return Receipt (electronic) \$0.00  
☐ Certified Mail Restricted Delivery \$0.00  
☐ Adult Signature Required \$0.00  
☐ Adult Signature Restricted Delivery \$0.00

Postage

\$7.75

Total Postage and Fees

\$14.15

Sent To

VILLAGE OF GERMAN TOWN, C/O Village Admin

Street and Apt. No., or PO Box No.

N172 WILCOX MEQUON RD

City, State, ZIP+4®

GERMANTOWN, WI 53022

U.S. Postal Service™

CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at www.usps.com®

Germantown, WI 53022

Certified Mail Fee

\$3.55

Extra Services &amp; Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$0.00  
☐ Return Receipt (electronic) \$0.00  
☐ Certified Mail Restricted Delivery \$0.00  
☐ Adult Signature Required \$0.00  
☐ Adult Signature Restricted Delivery \$0.00

Postage

\$7.75

Total Postage and Fees

\$14.15

Sent To

PETER HOELL

Street and Apt. No., or PO Box No.

W157 N9790 Glenwood RD

City, State, ZIP+4®

GERMANTOWN, WI 53022-5139

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions



(b) understands that he/she is solely responsible for keeping his/her Roll of Attorneys contact information current and accurate, see Ind. Admis. Disc. R. 2(A).

Attorneys can review and update their Roll of Attorneys contact information on the Courts Portal at <http://portal.courts.in.gov>.

3. This is a PL type as defined in administrative Rule 8(B)(3).
4. This case involves child support issues. Yes \_\_\_\_ No ✓
5. This case involves a protection from abuse order, a workplace violence restraining order, or a no – contact order. Yes \_\_\_\_ No ✓  
This case involves a petition for involuntary commitment. Yes \_\_\_\_ No ✓
6. If Yes above, provide the following regarding the individual subject to the petition for involuntary commitment: N/A
7. There are related cases: Yes \_\_\_\_ No ✓ (If yes, list on continuation page.)
8. Additional information required by local rule: N/A
9. There are other party members: Yes \_\_\_\_ No ✓ (If yes, list on continuation page.)
10. This form has been served electronically on all parties on the attached Certificate of Service: Yes

NORRIS CHOPLIN SCHROEDER LLP

/s/ Kyle A. Jones

Kyle A. Jones (#14274-49)

Counsel for the Defendants, The Village of  
Germantown and Peter Hoell

NORRIS CHOPLIN SCHROEDER LLP

101 West Ohio Street, Ninth Floor

Indianapolis, IN 46204-4213

317-269-9330; Fax: 317-269-9338

[kjones@ncs-law.com](mailto:kjones@ncs-law.com)

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served electronically through

GreenFiling on September 25, 2020, upon:

Derek R. Peterson

DEREK R. PETERSON-ATTORNEY AT LAW

156 Stony Creek Overlook

Noblesville, IN 46060

[DRPetersonlaw@gmail.com](mailto:DRPetersonlaw@gmail.com)

/s/ Kyle A. Jones

Kyle A. Jones

3. An enlargement of time of thirty (30) days to and including October 28, 2020, is reasonably necessary for the Defendants' attorney to confer with his clients and prepare an appropriate response to the Plaintiff's complaint.

4. No prior enlargements of time have been requested and no party will be prejudiced by the granting of this Motion.

5. Pursuant to Local Rule 49 – TR5 Rule 203(D), an initial written motion for enlargement of time pursuant to Ind. Trial Rule 6(B)(1) to respond to the claim shall be automatically allowed for an additional thirty (30) days from the original due date without a written order of the Court.

6. With the filing of this enlargement, Defendants' response to Plaintiff's complaint shall be due on or before October 28, 2020.

WHEREFORE, Defendants, The Village of Germantown and Peter Hoell, by counsel, respectfully state that their response to Plaintiff's complaint shall be due on or before October 28, 2020.

NORRIS CHOPLIN SCHROEDER LLP

/s/ Kyle A. Jones

Kyle A. Jones (#14274-49)

Counsel for the Defendants, The Village of  
Germantown and Peter Hoell

NORRIS CHOPLIN SCHROEDER LLP  
101 West Ohio Street, Ninth Floor  
Indianapolis, IN 46204-4213  
317-269-9330; Fax: 317-269-9338  
kjones@ncs-law.com

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served electronically through  
GreenFiling on September 25, 2020, upon:

Derek R. Peterson  
DEREK R. PETERSON-ATTORNEY AT LAW  
156 Stony Creek Overlook  
Noblesville, IN 46060  
DRPetersonlaw@gmail.com

/s/ Kyle A. Jones  
\_\_\_\_\_  
Kyle A. Jones